

Exhibit H

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

IN RE: AMERICAN EXPRESS ANTI-STEERING RULES
ANTITRUST LITIGATION (NO. II)

Master File No: 11-MDL- 2221 (NGG)(RER)

This Document Relates To:

ALL CASES

UNITED STATES OF AMERICA, ET AL.,

Case No: 10-CV-04496 (NGG)(RER)

Plaintiffs,

vs.

AMERICAN EXPRESS COMPANY, ET AL.,

Defendants.

[PROPOSED] AMENDED SCHEDULING ORDER

The following discovery order shall be in place, and supersedes previous scheduling orders in the cases:

1. The last day for the amendment of the pleadings or the addition of parties to these actions was March 16, 2011.
2. The last day for exchange of initial disclosures was April 14, 2011.
3. No new document requests shall be propounded after November 18, 2011 without leave of Court upon a showing of good cause.
4. No later than May 25, 2012, the parties shall submit a joint stipulation and proposed deposition discovery coordination order outlining the number of depositions (or deposition hours) each side will have through the remainder of fact discovery. If the parties

cannot agree, Defendants and each group of Plaintiffs shall instead submit a status report regarding their position and their own version of the proposed deposition discovery coordination order.

5. All document discovery shall be completed by July 2, 2012. This date shall not be extended except for unforeseen circumstances.

6. Any proposed or joint expert discovery coordination order(s) must be filed by February 1, 2013.

7. All fact discovery shall be completed by December 21, 2012, with the exception of the seven 30(b)(6) depositions noticed by plaintiffs that were the subject of Amex's motion to quash, which depositions shall be completed by February 1, 2013.

8. The parties shall serve expert reports on the subjects for which they bear the burden of proof at trial by April 2, 2013.

9. The parties shall serve any rebuttal expert reports by May 20, 2013.

10. Any sur-rebuttal reports shall be served by July 3, 2013.

11. All depositions of expert witnesses shall be taken between July 15, 2013 and August 14, 2013.

12. All expert discovery shall be completed by August 14, 2013.

13. The Court shall set a deadline for a joint pre-trial order and a date for a final pre-trial conference after taking into account the anticipated dispositive and class certification motions.

14. Any dispositive motions for class certification shall be filed and briefed on a schedule to be set by the Court.

15. Except as expressly provided above, the deadlines set forth herein may be extended upon a showing of good cause.

